

EXHIBIT J

Improper Assertions of the
Deliberative Process Privilege

ID Number	Custodian	Date	Application	Subject	Author	To	CC	Filename	Treatment	Claim	Privilege Statement
DOC_0808748	Christina Adkins	2/16/2023	Outlook Email	Fwd Alexa's Edits to RLA Document	Christina Adkins	Adam Bitter			Privileged - Withhold	Attorney Client; Deliberative Process	Email communication Elections Division staff and SOS attorney regarding what to include in its recommendation to the Legislature for the election audit
DOC_0808749	Christina Adkins	2/27/2023	Microsoft Word 2016		Alexa Buxkemper			Updated V2 Draft Report - Alexa's edits docx	Privileged - Withhold	Deliberative Process	Draft changes to risk-limiting audit pilot report 2022
DOC_0806487	Andre Montgomery	12/22/2022	Outlook Email	Legislative Report on CWPP	Andre Montgomery	Christina Adkins; Heidi Martinez			Privileged - Withhold	Attorney Client; Deliberative Process	Email communication between SOS attorneys regarding draft Legislative report on November 2020 election
DOC_0806885	Andre Montgomery	3/3/2023	Outlook Email	RE DRAFT email to Ellis County re Farmers Branch	Lena Proft	Elections-Attorneys			Privileged - Withhold	Attorney Client; Deliberative Process	Email conversation between SOS attorneys discussing draft email to Ellis County regarding implementation of SB1
DOC_0806901	Andre Montgomery	3/3/2023	Outlook Email	RE DRAFT email to Ellis County re Farmers Branch	Lena Proft	Heidi Martinez; Charles Pinney; Elections-Attorneys			Privileged - Withhold	Attorney Client; Deliberative Process	Email conversation between SOS attorneys discussing draft email to Ellis County regarding implementation of SB1
DOC_0806927	Andre Montgomery	3/3/2023	Outlook Email	Re DRAFT email to Ellis County re Farmers Branch	Charles Pinney	Lena Proft; Elections Attorneys			Privileged - Withhold	Attorney Client; Deliberative Process	Email conversations between SOS attorney and SOS legal regarding draft response email to Ellis County elections admin question on election procedures
DOC_0805973	Andre Montgomery	8/8/2022	Outlook Email	2020 Election Results E-mails	Andre Montgomery	Heidi Martinez			Privileged - Withhold	Attorney Client; Deliberative Process	Email communication between SOS attorneys regarding election results emails